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*Attorneys for Defendants John Cannon, Faith Colish,
C. Anne Harvey, Robert A. Kavesh, Howard A. Mileaf,
Edward I. O'Brien, William E. Rulon, Cornelius T. Ryan,
Tom D. Seip, Candace L. Straight, Peter P. Trapp and
Nominal Defendant Neuberger Berman Equity Funds*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BENJAMIN M. GAMORAN, derivatively on behalf
of the nominal defendant with respect to its
series mutual fund, the Neuberger Berman
International Fund,

Plaintiff,

- against -

NEUBERGER BERMAN MANAGEMENT LLC, et al.,

Defendants,

- and -

NEUBERGER BERMAN EQUITY FUNDS d/b/a/
NEUBERGER BERMAN INTERNATIONAL FUND,

Nominal
Defendant.

11 Civ. 07957 (TPG) (KNF)
ECF Case

**INDEPENDENT TRUSTEES' NOTICE OF MOTION TO DISMISS
PLAINTIFF'S VERIFIED DERIVATIVE AND CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that, upon the annexed Independent Trustees' Memorandum of Law in Support of Motion to Dismiss Plaintiff's Verified Derivative and Class Action Complaint and the Declaration of Nicholas G. Terris in Support of Independent Trustees' Memorandum of Law in Support of Motion to Dismiss Plaintiff's Verified Derivative and Class Action Complaint, Defendants John Cannon, Faith Colish, C. Anne Harvey, Robert A. Kavesh,

Howard A. Mileaf, Edward I. O'Brien, William E. Rulon, Cornelius T. Ryan, Tom D. Seip, Candace L. Straight, and Peter P. Trapp, and Nominal Defendant Neuberger Berman Equity Funds will move this Court, before the Honorable Thomas P. Griesa, District Court Judge, at the United States Courthouse for the Southern District of New York, Room 26B, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by this Court, for an Order, pursuant to Rules 12(b)(6) and 23.1 of the Federal Rules of Civil Procedure, dismissing plaintiff's Verified Derivative and Class Action Complaint.

Dated: December 8, 2011
New York, New York

Respectfully submitted,

K&L GATES LLP

By: /s/ Joanna A. Diakos

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Trapp and Nominal Defendant Neuberger Berman
Equity Funds*